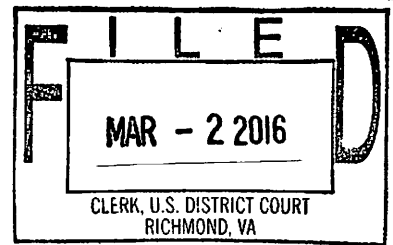


IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Richmond Division



UNITED STATES OF AMERICA

V.

CLYDE BROWN,

Defendant.

Criminal No. 3:16-cr- 030

Theft of Public Money (18 U.S.C. § 641)

Making a False Statement (18 U.S.C. § 1001)

INDICTMENT

March 2016 Term - At Richmond

THE GRAND JURY CHARGES THAT:

COUNT ONE
(Theft of Public Money)

1. Beginning in or around January 1992, and continuing to in or around December 2012, in the Eastern District of Virginia and elsewhere, and within the jurisdiction of this Court, defendant CLYDE BROWN did knowingly steal, purloin, and convert to his own monies more than \$1,000 belonging to the Social Security Administration, being Social Security Disability Benefits, to which he was not entitled.

(In violation of Title 18, United States Code, Sections 641 and 2).

COUNT TWO
(Making a False Statement)

2. Paragraph 1 of this Indictment is realleged and incorporated by reference as though fully set forth here.

3. On or about May 17, 2012, in the Eastern District of Virginia and elsewhere, and within the jurisdiction of this Court, defendant CLYDE BROWN willfully and knowingly made and caused to be made a materially false, fictitious, and fraudulent statement and representation in a matter within the jurisdiction of the executive branch of the Government of the United States, by knowingly and fraudulently causing an Application Summary for Supplemental Security Income under a Social Security Number ending in 7056 to be completed and submitted to the United States Social Security Administration, which the defendant then and there knew to be false, that is, CLYDE BROWN knowingly and falsely verified under penalty of perjury that 'this report of income is valid for any and all SSI claims in which I am involved' and 'I do not receive any other type of income.'

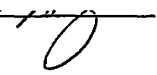
(In violation of Title 18, United States Code, Sections 1001 and 2.)

FORFEITURE ALLEGATION


Pursuant to Rule 32.2(a) of the Federal Rules of Criminal Procedure, the defendant is hereby notified that upon conviction of the offense charged in Count One of this Criminal Information, the defendant shall forfeit to the United States any property which constitutes or is derived from proceeds traceable to the violation. Property subject to forfeiture includes proceeds of at least \$43,752.70. If the property subject to forfeiture cannot be located, the United States will seek an order forfeiting substitute assets.

(In accordance with Title 18, United States Code, Section 981(a)(1)(C), as incorporated by Title 28, United States Code, Section 2461.)

A TRUE BILL:

~~FOREPERSON~~ 

DANA J. BOENTE
UNITED STATES ATTORNEY

By: 
S. David Schiller
Assistant United States Attorney

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office